

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

**IN RE: ETHICON INC.,  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION**

**MDL NO. 2327**

**THIS DOCUMENT RELATES TO:**

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*Tammy Pizzitola v. C. R. Bard, Inc., et al.*      **Case No. 2: 13-cv-00249**

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**DEFENDANT C. R. BARD, INC.'S MOTION TO EXCLUDE OR LIMIT CERTAIN  
OPINIONS AND TESTIMONY OF KEITH REEVES, M.D.**

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*Attorneys for C. R. Bard, Inc.*

COMES NOW Defendant, C. R. Bard, Inc. (“Bard”), and pursuant to Federal Rules of Evidence 702, 703, 403, and 104, and *Daubert v. Merrell Dow Pharmaceuticals, Inc.* 509 U.S. 579 (1993), and its progeny, respectfully moves the Court for an order excluding the expert opinions and testimony of Plaintiff’s proffered expert, Keith Reeves, M.D.

This Motion, as explained in more detail in the accompanying Memorandum of Law in Support, is based on the grounds that the Court should exclude opinions for which Dr. Reeves does not have a reliable basis and that are not supported by sufficient facts and data. Dr. Reeves also should not be permitted to offer opinions that were not disclosed in his Rule 26 Expert Report or that he disclaimed or limited in his deposition. This Motion is supported by the accompanying Memorandum of Law in Support, the exhibits attached hereto, and all other papers and pleadings on file in this action.

WHEREFORE, for the reasons set forth above and in the accompanying Memorandum of Law in Support, Bard respectfully requests that this Court enter an Order excluding the opinions and testimony that Dr. Reeves may provide at the trial of this matter.

Dated: January 23, 2020

Respectfully submitted,

/s/ Mildred Segura

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2020, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Mildred Segura  
Mildred Segura